

National Organic Standards Board
c/o Arthur Neal; Room 4008 - South Building
1400 Independence Avenue, SW
Washington, D.C. 20250-0001.

Via email: NOSB.livestock@usda.gov
Aug. 12, 2004

Comments on:

***NOSB Livestock Committee Recommendation for Guidance on Pasture Requirements
for the National Organic Program, July 12, 2005***

Dear NOSB members,

The Northeast Organic Farming Association Chapters of NY, NJ, VT, and CT welcome the changes NOSB has proposed as guidance for organic pasture requirements, that the NOP can review and distribute to accredited certifying agents and post on the NOP website. This will help ensure consistency of interpretation, along with the important NOSB recommended regulation changes that clarify that requirements for pasture cannot be waived during lactation. These combined policies will help ensure ruminant livestock do have suitable access to pasture in organic systems.

We do suggest a few minor changes to improve clarity, and reflect language the Board originally adopted unanimously in Oct. 2001.

Additions in underline below, deletions in strikeout:

A. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The certified operation, as reflected in the Organic System Plan, shall have the goal of providing a significant portion of the total feed requirements as grazed feed, which means greater than 30% dry matter intake on an average daily basis during the growing season but not less than 120 days per year. Growing season means the time of year ~~of that~~ pasture growth is possible from natural precipitation or ~~manual~~ irrigation practice. The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements.

Comments:

1. The *Organic System Plan* is the vehicle to establish goals and timeline for the operation, but the farm operation is more accurately described as provider of feed.
2. “Significant portion of the total feed ” describes the goal for the OSP, and was supported by the full Board in its Oct. 17, 2001 pasture recommendation.
3. “Per year” has been added for time frame clarity. Without this clarification, in areas with long or continuous growing seasons, the minimum grazing time might be applied to an interval longer than one year.
4. Wording in the growing season definition was modified to enhance comprehension.

We support the changes in Part C, which refers to NRCS practices standards as “a tool” that “can be” used instead of “shall be used.” It is important to retain the reference here to the Organic System Plan, as documentation that the certified operation has the goal of providing a significant portion of the total feed requirements as grazed feed. Otherwise, goals set under NRCS practice standards may not be compatible with organic systems.

C) Appropriate Pasture Conditions

As a tool for the farmer and the certifier, appropriate pasture conditions *can be* determined by referring to the regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan.

Thank you for considering these clarifications, and consulting so broadly with the organic community on this important topic.

Sincerely,

Emily Brown Rosen, for the Northeast Organic Farming Association of New Jersey
John Cleary, for the Northeast Organic Farming Association of Vermont
Elizabeth Henderson, for the Northeast Organic Farming Association of New York
Bill Duesing, for the Northeast Organic Farming Association of Connecticut